

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	
)	Case No. 22-10943 (MEW)
Debtors. ¹)	
)	(Jointly Administered)

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rules of Civil Procedure 30(b)(6) and 45, the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., *et al.* ("Committee"), by and through its undersigned counsel, will take the remote deposition of a designated corporate representative of Alameda Ventures Ltd. ("Alameda"), on the list of topics set forth in Exhibit A,² served together with this notice upon Alameda, on **February 27, 2023**, commencing at 10:00 AM (prevailing Eastern Time) at the offices of McDermott Will & Emery LLP, One Vanderbilt Avenue, New York, New York 10017, or at such other time and place mutually acceptable to counsel, and will continue from day to day until completed. A link and any necessary credentials will be provided in advance of the deposition. The Committee demands that Alameda identify the corporate representative or representatives most knowledgeable about the topics set forth in Exhibit A by no later than **February 17, 2023**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.'s and Voyager Digital Ltd.'s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC's principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

² The list of topics set forth in Exhibit A incorporates by reference the definitions set forth in the Committee's First Set of Document Requests to Alameda Ventures Ltd. dated February 15, 2023.

The deposition by oral examination will be taken before a notary public or an officer authorized by law to administer oaths upon oral examination and will be recorded by a certified court reporter stenographically and by audio. The deposition may also be videotaped.

Dated: New York, New York
February 18, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Joseph B. Evans

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy the foregoing *Notice of Subpoena* was served on February 18, 2023, by (i) electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York upon all registered users thereof entitled to receive notices in these chapter 11 cases, and (ii) by e-mail on upon the following additional parties:

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